

Coordination of Benefits Agreement (COBA) Frequently Asked Questions

SECTION I - ELIGIBILITY FILES

- 1. Will the eligibility file format change?**
No. The current 200-byte standard COB eligibility file format will be used for COBA.
- 2. Will the COBC accept or expect a 997 acknowledgment?**
No. The COBC will forward an Eligibility Detail Report to notify Trading Partners or Trading Partner Contractors of the receipt of an eligibility file. The detail section will contain a list of all eligibility records processed. The detail section will contain a list of all eligibility records processed. The summary section will contain the number of records submitted, and show the number of adds, updates, deleted records, and errors. We won't accept 997 or negative TA1.
- 3. How often will the Trading Partner be allowed to provide eligibility files?**
Weekly, bi-weekly, or monthly.
- 4. Is the COBC expecting a full file replacement of our eligibility file? When will our eligibility file be loaded?**
The COBA process will support full file replacement or adds, updates, and deletes. The COBC will load eligibility files on a daily basis. The Trading Partner will need to indicate its frequency of eligibility file submission to the COBC in the COBA Attachment. The eligibility file data are uploaded to CWF within five business days of receipt. For examples, please refer to the Eligibility File Section of the Implementation Guide.
- 5. The eligibility file processing indicates that there must be a separate header record for each COBA ID. When I review the header record layout for the eligibility file there is a Header Beneficiary state code. From reviewing the header record layout it looks like what is required is a file sorted by COBA ID and by Beneficiary State. Which sort should be primary?**
Trading Partners should sort the eligibility file by COBA ID. The COBA process will not utilize the optional beneficiary state code field. For examples, please refer to the Eligibility Update Process Section of the Implementation Guide.
- 6. In the eligibility file processing COBA eligibility layout there is no indication as to what should be reported in the "Eligibility To Date" field when the coverage extends indefinitely into the future. How does the COBC expect this date to be filled where the insured's coverage extends indefinitely into the future?**
Trading Partners should indicate zeros in the field for open-ended dates. Do not use future dates.

7. **The eligibility file load “BO Error Report” looks like it will be sent to us via Connect Direct and we should make corrections based on the report. Once the corrections have been made, what is the process for sending them back to the COBC and having them updated onto the eligibility master file?**

For those who use full file replacement, the corrected file must be a full file replacement. For those who use adds, updates and deletes, submit only the corrected records. Corrections will be allowed on off-schedule transmissions. Please refer to the Full File Replacement Section of the Eligibility Update Process in the Implementation Guide.

- **What turn-around time should we expect from the time the file is sent to you until the time the “BO Error Report” is available to us?**

We will process eligibility files, including corrected files, within five business days of receipt and you will have the BO Error Report on the sixth day.

- **What turn-around time is the COBC expecting to receive corrections from us?**

The Trading Partner should correct the errors immediately and resend to the COBC.

- **What turn-around time should we expect from the COBC before the corrections we prepare are applied to the eligibility file?**

eligibility file corrections to the CWF system will occur within five business days of receipt of the eligibility file

8. **The error report description indicates an eligibility record will not be updated when one or more “BO...” errors are found but only the first error encountered will be reported. Since up to five eligibility dates could be reported on the file, at worst case a record could be resubmitted fourteen times to correct all the errors.**

- **Can the report be modified to show all the errors that prevent update instead of only the first one encountered?**

BO01 through BO04 could occur once, while BO14 and BO15, the effective and termination errors, could occur for each of the five dates on the eligibility file-or at worst case ten times. CWF will accommodate up to four BOI error replies per eligibility record.

9. **Can you please explain how a full file replacement eligibility will be differentiated by COBC from Deletes/Adds/Changes?**

The COBA process will not utilize the File Update Indicator field on the eligibility file for full file replacement. The use of full file replacement should be indicated in Section III.A.3 of the COBA Attachment.

10. **If the beneficiary gender code is unknown to us, should we use M or F as a default? In the eligibility file layout these are the only allowed values indicated.**

- **What are the implications of using a default? Would claims that may otherwise match to one of our insureds miss being reported to us?**

The primary match will be on HICN. A secondary match will be on the first initial of the beneficiary's First Name, Date of Birth, Sex Code and the first six characters of the beneficiary surname. Trading Partners should use the value code representation of M as a default for the beneficiary sex code. Eligibility records that match on three out of the four matching criteria in the secondary match will pass.

11. **Can we send a partial eligibility file with which to perform testing?**
Yes.
12. **Should the eligibility file include only those instances where the Trading Partner is secondary to Medicare? For example, can the eligibility file include records for beneficiaries where the Trading Partner is the primary payer and Medicare is secondary?**
The COBA eligibility file should contain records only for beneficiaries for whom the Trading Partner provides supplemental coverage.
13. **Based on the edit errors noted in the Implementation Guide, what would be considered an invalid match? For example, if a Trading Partner sends the wrong beneficiary surname or spelling of a surname will this constitute an invalid record?**
The primary match will be on HICN. A secondary match will be on the first initial of the beneficiary's First Name, Date of Birth, Sex Code and the first six characters of the beneficiary surname. Eligibility records that match on three out of the four matching criteria in the secondary match will pass.
14. **When can we anticipate seeing the eligibility file layout denoting the mandatory fields?**
The layout is in the COBA Implementation User Guide.
15. **The COBA Eligibility File Layout under Header Records item number 4 "Header Beneficiary State Code" a description is provided indicating "Beneficiary state of residence." Please clarify the intended use of this field. Is this the Plan reporting state or the actual address of the beneficiary? If this is the beneficiary address, does this need to appear in the header record or on each beneficiary's record and not the header?**
The Beneficiary State Code is not a required field and it will not be used in this process.
16. **If a record is rejected by CMS or if the record is excluded from the COBA eligibility feed, how will CMS process this information? Will this result in CMS deleting or canceling the member's crossover record?**
If an eligibility record fails then the record is not loaded. The COBA process will generate a detail report identifying all records receiving one or more errors. For those who use full file replacement, the corrected file must be a full file replacement. For those who use adds, updates and deletes, submit only the corrected records. Corrections will be allowed on off-schedule transmissions. Please refer to the Full File Replacement Section of the Eligibility Update Process in the Implementation Guide.
17. **If an entire eligibility file is rejected or fails, will CMS delete all records or cancel all records based on that file? Or will CMS continue to hold the information received from the previous file and only reject the current file?**
If an entire eligibility file rejects, the COBA process will generate a detailed report. The COBA process will continue to crossover claims based on the prior eligibility file.
18. **Will the error reporting mirror or look similar to MSP? Will there be specified error percentages for duplicates, deletes, etc., similar to MSP? Will error percentages for those Trading Partners belonging to the Blue Cross and Blue Shield Association be reported to the Association, similar to MSP?**
Refer to the COBA Implementation User Guide for a sample Eligibility Detail Report.

19. **Once the agreement is signed and beta testing begins, can the eligibility file frequency be modified or changed. If weekly files are being sent initially, can we modify this to be bi-weekly sometime in the future?**
Yes. The Trading Partner may communicate any changes to its selected options by completing and submitting another COBA Attachment, indicating on page 1 that this is a change.
20. **Would CMS consider sending back to the Trading Partners on the eligibility response file the Beneficiary Supplemental ID Number?**
Yes. The Eligibility Detail Report has been updated to include the beneficiary supplemental ID as submitted on the eligibility file by the Trading Partner.
21. **When looking at “Beneficiary Supplemental Eligibility to and from dates” and calculating end dates, does CMS consider the actual date recorded as a coverage end date or is that date a coverage through date?**
The date is the coverage through date.
22. **If the effective date is equal to the cancel date, does CMS want to see these on the eligibility file?**
No. If received, it will be interpreted as one-day of coverage and we assume you would not want this situation.
23. **Can a Trading Partner send multiple records for a beneficiary under two different Beneficiary Supplement ID Numbers? So, if a beneficiary is covered as a spouse under one policy and covered as the contract holder under another policy, both having secondary coverage to Medicare, can CMS accept both numbers?**
If you send the numbers in two different eligibility files, it will be accepted. If you send both numbers on the same eligibility file, it will be treated as a duplicate.
24. **Can a Trading Partner submit an eligibility file from a different location, and/or using a different communication method than used for the claim file receipt? (That is, claims are received via NDM and eligibility sent via FTP.)**
Yes.
25. **What if our eligibility file correctly contains less than 70% of the records currently in our database? We will be sending one eligibility file for many COBA ID's with full file replacement (we are a clearinghouse). There may be a time when our population of Trading Partners changes; therefore, a drastic variance will occur in the eligibility file sent to COBC. How will we be able to update the records with a file that contains less than a 70% match?**
Each COBA ID will be edited and checked for the required 70% threshold. Secondly, the COBC's EDI representative will notify the Trading Partner of COBA IDs that fail the threshold. The EDI representative will have the capability to override the system and continue process for approved COBA IDs, which do not meet the required 70% threshold.
26. **Does the date of birth have to be exact or is there a certain number of days leeway?**
Within date of birth, the month and year must match exactly, but the day can be incorrect.

27. How will we be able to receive/view the detail error report?

The Eligibility File Detail Report will be forwarded electronically to Trading Partners upon processing of each incoming eligibility file. It will be transmitted to you via the same transmission method as it is received.

28. If multiple insurance companies have the same insured on their eligibility file, will ALL companies receive the crossover claim?

CWF is capability of holding 10 COBA IDs simultaneously, the maximum number of entities that would receive the crossover claim. This is true for both test and production files.

29. Will it be acceptable under beta testing to send a separate COBA eligibility file for each COBA ID? Under live production is it expected that a separate COBA eligibility file be transmitted for each COBA ID? Or should these appear on one file with headers and trailers for both beta testing and live production?

Trading Partners have the option of submitting a separate eligibility file for each COBA ID or combining all their Eligibility records into a single file. In the combined file scenario, all beneficiary records must be sorted by COBA IDs and separated by a header and trailer.

30. In the event that multiple COBA files are acceptable, can the Trading Partner expect to receive error reports for each COB eligibility file transmitted? Or will the error report come back in one file? For example: 5 COBA ID eligibility files transmitted will 5 error reports be submitted back to the Trading Partner?

The Trading Partner can expect to receive an error report for each file submitted. If five COBA IDs are on one file, you will receive five separate error reports in that one file.

31. In the event that multiple files are submitted, how will the 20% threshold of errors be calculated. Will each file be subjected to the 20% threshold or will the files be combined and viewed as one file by CMS for calculating the 20%?

The 20% threshold will be applied per COBA ID. The return error report will be broken out by COBA ID. If one file with multiple COBA IDs is submitted, the trading partner would receive one file with a separate report for each COBA ID.

32. In the event multiple files are submitted and one file contains over 20% errors, will all files be returned or just the file on the COBA ID that exceeded the 20%?

Each ratio is applied to each COBA ID.

SECTION II - TECHNICAL REQUIREMENTS

1. When will Trading Partners be able to test with the COBC?

The COBC will provide Trading Partners with an available test date once they have received and processed the executed COBA.

2. When will the technical guide be made available to Trading Partners?

The COBA Implementation User Guide is available to Trading Partners at www.cms.hhs.gov/medicare/cob

3. What types of file transfer methods will be supported by the COBA?

Our preferred method of transmission is NDM via AGNS. However, other methods of data transmission will be considered as long they meet CMS' standard security data requirements.

4. Will tape transfers be supported?

Yes. The COBA program will accept 3480 cartridges as well as reel tapes (1600 BPI and 6250 BPI).

5. What encryption is required for FTP files?

CMS considers Secure FTP an acceptable protocol and will provide requirements upon approval to the COBC for use with the COBA process. CMS is currently evaluating the minimum standard for encryption via the Internet.

6. For FTP connections, is it possible for the COBC to specify a list of IP addresses (up to 3) that would be used for outbound files?

CMS considers Secure FTP an acceptable protocol and will provide requirements upon approval to the COBC for use with the COBA process. CMS is currently evaluating the minimum standard for encryption via the Internet.

7. For both, sending eligibility files to the COBC and receiving 837 COB files from the COBC, is there a public FTP option, or do we have to use the AT&T global network?

CMS considers Secure FTP an acceptable protocol and will provide requirements upon approval to the COBC for use with the COBA process. CMS is currently evaluating the minimum standard for encryption via the Internet.

8. For sending/receiving FTP files, is there further information available regarding file encryption and key exchanges?

CMS considers Secure FTP an acceptable protocol and will provide requirements upon approval to the COBC for use with the COBA process. CMS is currently evaluating the minimum standard for encryption via the Internet.

SECTION III - COBA IDENTIFICATION NUMBER

- 1. Will the Trading Partner use its current insurer identification number as assigned by Medicare Contractors?**
No. The COBC will assign a COBA number for use in generating test and production eligibility files.
- 2. At what point in the COBA process will new COBA ID numbers be issued?**
The COBA ID will be issued to the Trading Partner upon receipt of an executed COBA and Attachment.
- 3. How many identification numbers will a Trading Partner receive from the COBC?**
At a minimum, the COBC will assign separate COBA IDs to those insurers having Medigap and other lines of business for use in generating eligibility files. Trading partners will also receive separate COBA IDs if: 1) the trading partner submits separate eligibility files, as in the case of two distinct lines of business; 2) the trading partner elects separate claims selection options within the same line of business or separate claims selection options per each line of business; 3) if there are differences with respect to Sections II, III, and IV of the COBA Attachment.